

MARGARET TAYLOR FINUCANE, ESQ.
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Attorney for Defendant
Port Authority Trans-Hudson Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ANNA McCLEMENT,

Plaintiff,

vs.

**PORT AUTHORITY TRANS-HUDSON
CORPORATION, a wholly owned subsidiary
of PORT AUTHORITY OF NEW YORK
AND NEW JERSEY**

Defendant.

CIVIL ACTION NO.: 11-06839 (CCC)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

To: D. Gayle Loftis, Esq.
Attorney for plaintiff
210 River Street, Suite 32
Hackensack, NJ 07601

PLEASE TAKE NOTICE that on February 2, 2015, at 9:00 a.m., or on such date and such time as counsel may be heard, defendant Port Authority Trans-Hudson, through its counsel Margaret Taylor Finucane, shall move before the Honorable Claire C. Cecchi, U.S.D.J., at the Martin Luther King, Jr. Federal Building and Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order granting Port Authority Trans-Hudson summary judgment.

PLEASE TAKE FURTHER NOTICE that Port Authority Trans-Hudson shall rely upon the enclosed supporting Statement of Material Facts Pursuant to L. Civ. R. 56.1,

Memorandums of Law, Declaration of Thomas R. Brophy, Esq., with Exhibits, Certification of John Sisak, with Exhibits, Certification of Cynthia Bacon, Certification of Stephanie Lewis-Desire and the pleadings and other documents previously filed in this action.

Dated: New York, New York

December 30, 2014

Respectfully submitted,

Margaret Taylor Finucane
Attorney for Defendant
Port Authority Trans-Hudson

By: s/ Thomas R. Brophy _____
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